1 The Honorable Richard A. Jones 2 3 4 5 6 7 8 IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 ABDIQAFAR WAGAFE, et al., on behalf of CASE NO. C17-00094RAJ himself and other similarly situated, 11 STIPULATION FOR ORDER 12 Plaintiffs, REVISING CASE SCHEDULE; ORDER THEREON 13 v. 14 DONALD TRUMP, President of the United States, et al., 15 Defendants. 16 17 WHEREAS the Court's January 16, 2020 order, Dkt. 320, affects briefing on Plaintiffs' 18 pending motion to compel, Dkt. 312; and 19 20 WHEREAS the parties agree that reproduction of the documents at issue in the motion to compel consistent with the Court's January 16, 2020 order, Dkt. 320, could narrow the dispute over 21 22 privilege redactions; and WHEREAS the parties are cognizant of the prior extensions of the case schedule and do not 23 wish to disturb the deadlines for dispositive motions or the trial date; and 24 WHEREAS, the parties have met and conferred and negotiated a proposal, set out below, 25 only to adjust the case schedule to allow the parties adequate time to review the documents at issue 26 27 28

STIPULATION FOR ORDER REVISING CASE SCHEDULE; ORDER THEREON - 1 (Case No. C17-00094RAJ) UNITED STATES DEPARTMENT OF JUSTICE
CIVIL DIVISION, OFFICE OF IMMIGRATION LITIGATION
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in the motion to compel and file appropriate responses, but without disturbing the deadlines for dispositive motions or the trial date; and

WHEREAS the parties are mindful of their obligations to adhere to the case schedules adopted by the Court, and have been endeavoring to comply, but jointly believe there is good cause for a modification of the case schedule because of the necessities of the case, as summarized above,

NOW THEREFORE the parties through their respective counsel of record do hereby stipulate and agree that the Court may make and enter the following order:

The case schedule established by the Court on October 24, 2019 (Dkt. #298), as modified by the Court's docket text orders of December 18, 2019 and January 3, 2020, shall be further modified as follows:

- (1) The deadline for Defendants to file their response to the motion to compel, Dkt. 312, shall be moved to February 4, 2020, and the deadline for Plaintiffs to file their reply shall be moved to February 7, 2020.
- (2) Defendants will review and reproduce the documents at issue in the motion to compel to Plaintiffs by January 27, 2020, and the parties will hold a meet and confer on January 31, 2020, to determine what, if any, issues remain for purposes of the motion to compel.
- (3) Plaintiffs' reply brief page limit with respect to the motion to compel shall be expanded from 6 to 8 pages.
- (4) All other deadlines set forth in the Court's October 24, 2019 order (Dkt. #298), as modified by the Court's docket text orders of December 18, 2019 and January 3, 2020, shall remain in effect.

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1	SO STIPULATED.	
2	DATED: January 17, 2020.	
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SO STIPULATED. 1 DATED: January 17, 2020. 2 s/ Jennifer Pasquarella s/ Harry H. Schneider, Jr. Jennifer Pasquarella (admitted pro hac vice) s/ Nicholas P. Gellert 3 **ACLU Foundation of Southern California** s/ David A. Perez s/ Heath L. Hyatt 1313 W. 8th Street 4 Harry H. Schneider, Jr. #9404 Los Angeles, CA 90017 Telephone: (213) 977-5236 Nicholas P. Gellert #18041 5 David A. Perez #43959 ipasquarella@aclusocal.org 6 Heath L. Hyatt #54141 s/ Matt Adams Perkins Coie LLP 7 Matt Adams #28287 1201 Third Avenue, Suite 4900 Northwest Immigrant Rights Project Seattle, WA 98101-3099 615 Second Ave., Ste. 400 Telephone: 206.359.8000 8 HSchneider@perkinscoie.com Seattle, WA 98122 9 Telephone: (206) 957-8611 NGellert@perkinscoie.com matt@nwirp.org DPerez@perkinscoie.com 10 s/ Stacy Tolchin HHyatt@perkinscoie.com Stacy Tolchin (admitted pro hac vice) 11 Law Offices of Stacy Tolchin s/ Trina Realmuto 634 S. Spring St. Suite 500A s/ Kristin Macleod-Ball 12 Los Angeles, CA 90014 Trina Realmuto (admitted pro hac vice) Telephone: (213) 622-7450 Kristin Macleod-Ball (admitted pro hac vice) 13 Stacy@tolchinimmigration.com **American Immigration Council** 1318 Beacon Street, Suite 18 14 Brookline, MA 03446 s/ Hugh Handeyside s/ Lee Gelernt Telephone: (857) 305-3600 15 s/ Hina Shamsi trealmuto@immcouncil.org Hugh Handeyside #39792 kmacleod-ball@immcouncil.org 16 Lee Gelernt (admitted pro hac vice) Hina Shamsi (admitted pro hac vice) s/ John Midgley 17 **American Civil Liberties Union Foundation** John Midgley #50517 125 Broad Street **ACLU of Washington Foundation** 18 New York, NY 10004 P.O. Box 2728 Seattle, WA 98111 19 Telephone: (212) 549-2616 lgelernt@aclu.org Telephone: (206) 624-2184 hhandeyside@aclu.org jmidgley@aclu-wa.org 20 hshamsi@aclu.org 21 Counsel for Plaintiffs 22

STIPULATION FOR ORDER REVISING CASE SCHEDULE; ORDER THEREON - 4 (Case No. C17-00094RAJ)

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United States Department of Justice Civil Division, Office of Immigration Litigation Ben Franklin Station, P.O. Box 878 Washington, D.C. 20044 (202) 616-4900

ORDER

IT IS SO ORDERED.

DATED: January 2020.

RICHARD A. JONES

United States District Judge

STIPULATION FOR ORDER REVISING CASE SCHEDULE; ORDER THEREON - 5 (Case No. C17-00094RAJ) United States Department of Justice Civil Division, Office of Immoration Litigation Ben Franklin Station, P.O. Box 878 Washington, D.C. 20044 (202) 616-4900